

DARE INVESTMENTS, LLC, a Utah
limited liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY, a Missouri domiciled insurer;
HORIZON TITLE AGENCY, Inc., a New
Jersey domiciled company; CHICAGO
TITLE RICO ENTERPRISE, a
racketeering enterprise,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Case Action No.2:10-CV-
06088(DRD)(MAS)

Motion to Dismiss
Return Date: March 7, 2011
ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS

To: Plaintiff's Counsel, by operation of this Court's ECF system,

Please take notice that on March 7, 2011, Chicago Title Insurance Company ("Defendant"), by and through its counsel, Riker Danzig Scherer Hyland & Perretti LLP, shall make an application to the United States District Court for the District of New Jersey for an order granting Defendant's Motion to Dismiss plaintiff's Complaint.

Please take further notice that in support of this motion, Defendant shall rely on the accompanying memorandum of law in support thereof, Certification of Michael R. O'Donnell, Esq. with Exhibits attached thereto, and the Complaint (Docket Entry 1) with the Exhibits thereto filed under a separate cover

(Docket Entry 4).

Please take further notice that a proposed order granting Defendant's motion also is attached.

Please take further notice that oral argument is requested only in the event that timely opposition is filed and accepted.

Dated: February 9, 2011

Counsel for Defendant
Chicago Title Insurance Company
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